

Kent Ries, Attorney at Law  
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COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

**IN RE:** §  
§  
**MICHAEL STEPHEN GALMOR,** § **CASE NO. 18-20209-RLJ-7**  
§  
**Debtor.** §

**OBJECTION TO CLAIM NUMBERS 17, 18 AND 19 OF FIRST STATE BANK OF  
MOBEETIE**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

COMES NOW, Kent Ries, Trustee (“Trustee”) of the referenced chapter 7 bankruptcy estate, and files this Objection to Claim Numbers 17, 18 and 19 of First State Bank of Mobeetie and in support thereof would respectfully show unto the Court as follows:

1. Debtor filed for relief under Chapter 11 of the United States Bankruptcy Code on June 19, 2018, and converted to a Chapter 7 case on January 8, 2019. Kent Ries was subsequently appointed and qualified to serve as the Trustee over the bankruptcy estate.

2. This Court has jurisdiction over the subject matter of this Objection pursuant to the terms and provisions of 28 U.S.C. §§1334 and 157(b)(2)(B), 11 U.S.C. §§ 502, 506 and 507 as well as Rule 3007 of the Federal Rules of Bankruptcy Procedure.

3. On or about October 2, 2018, First State Bank of Mobeetie filed a Proof of Claim as a secured claim in the amount of \$82,165.28 based on a lien on 100 head of cattle. The claim was

subsequently docketed as Claim Number 17 on the Claims Register maintained by the Bankruptcy Clerk.

4. On or about October 2, 2018, First State Bank of Mobeetie filed a Proof of Claim as a secured claim in the amount of \$213,645.78 based on a lien of 300 acres of real estate in Wheeler, County, Texas. The claim was subsequently docketed as Claim Number 18 on the Claims Register maintained by the Bankruptcy Clerk.

5. On or about October 2, 2018, First State Bank of Mobeetie filed a Proof of Claim as a secured claim in the amount of \$58,905.96 based on accounts receivable and farm products. The claim was subsequently docketed as Claim Number 19 on the Claims Register maintained by the Bankruptcy Clerk.

6. Trustee objects to the allowance of Claim Numbers 17, 18 and 19 of First State Bank of Mobeetie as all of these claims have been paid in full from the secured property sold by the Estate.

**WHEREFORE, PREMISES CONSIDERED,** the Trustee, Kent Ries, respectfully prays for an Order of this Court denying the claims filed by First State Bank of Mobeetie for the reason stated above and for such other relief, at law or in equity, to which the Trustee may show himself justly entitled.

Respectfully submitted,

Kent Ries, Attorney at Law  
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By: /s/ Kent Ries

Kent Ries  
State Bar No. 16914050  
COUNSEL FOR TRUSTEE

**IMPORTANT NOTICE**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 205 SOUTHEAST FIFTH AVENUE, ROOM 201D, AMARILLO, TEXAS 79101, BEFORE 4:30 P.M. ON AUGUST 10TH 2023, WHICH IS AT LEAST 30 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

**CERTIFICATE OF SERVICE**

I certify that on the 11<sup>th</sup> day of July 2023, a true and correct copy of the foregoing Objection was sent either electronically via ECF or mailed in the United States mail, postage prepaid, to the parties listed below:

U.S. Trustee  
1100 Commerce Street, Room 9C60  
Dallas, Texas 75242

Patrick Alan Swindell  
Swindell Law Firm  
106 SW 7<sup>th</sup> Ave.  
Amarillo, Texas 79101

First State Bank of Mobeetie  
Reuben L. Hancock  
7480 Golden Pond Place, Suite 200  
Amarillo, Texas 79121

/s/ Kent Ries  
Kent Ries, Trustee